



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

October 22, 2008

Reply To
Mail Stop: EPTA – 088

08-059-NOA

Mr. George Galasso
Olympic Coast National Marine Sanctuary, Management Plan Review
115 Railroad Avenue East, Suite 301
Port Angeles, Washington 98362

Dear Mr. Galasso:

The U.S. Environmental Protection Agency has reviewed the Notice of Intent to prepare an Environmental Impact Statement (EIS) on **revisions to the Management Plan/Regulations for the Olympic Coast National Marine Sanctuary (OCNMS)**. We are submitting scoping comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

We appreciate your taking the time to discuss the issues concerning the OCNMS and the need for updating the original management plan, which was prepared as part of the sanctuary designation process in 1993. The 2008 OCNMS Condition Report and the public scoping comments were also helpful as background. All considered, we recommend that the Management Plan/Regulations update and EIS address the following needs:

Continue learning, inventory, and research within the Sanctuary.

- Continue habitat mapping and baseline inventory of biota.
- Monitor conditions and trends, particularly indicators and stressors of climate change, for oceanic conditions, physical and chemical features and processes, and marine biota.
- Advance the study, knowledge, and awareness of oxygen depletion – its causes, locations, consequences, and future threats.
- Monitor sanctuary resources, including but not limited to species that are threatened, endangered, in decline, or that have been significantly impacted, and the food chain and physical conditions that support them.
- If suitable locations are not available outside the Sanctuary, consider requests to conduct wave energy and other power generating research only where and to the extent that Sanctuary resources would not be compromised.

Address known and potential threats to the Sanctuary, emphasizing prevention in addition to mitigation and remediation.

- Develop adaptation needs, strategies, and potential management actions for climate change.
- Identify the sources of marine debris, prevent further releases, and clean up existing debris, especially plastics and derelict fishing gear.
- Identify and clean up threats to water quality, such as nearshore dumpsites, marine vessel discharges, land-based sewage discharges, and potential discovery of hazardous materials.
- Identify and appropriately restrict or co-manage military activities affecting the Sanctuary, including sonar/sound impacts to biota, and activities or substances that would alter, degrade, or destroy marine resources.
- Help to prevent overfishing and contribute to recovery of depleted fisheries. For example, consider designating marine reserves and refugia.
- Prohibit or adequately restrict fishing techniques that damage the sea floor, such as, bottom trawling and long lining.
- Advance marine vessel safety, underwater noise control, and oil spill preparedness.
- Identify, prevent, and remove invasive species.
- Study deposition and impacts from airborne pollutants.

Energize and enable Sanctuary management, regulation, and administration to respond to emerging needs.

- Help to identify information gaps and research needs.
- Consider more frequent management plan and regulatory updates to increase responsiveness to changing ocean conditions, species and marine resource protection and recovery needs, and Sanctuary protection/damage prevention.
- Develop strong partnerships to improve management plan implementation.
- Examine Sanctuary boundaries and recommend any additional areas in need of protection/inclusion within the OCNMS.
- Provide knowledge, awareness, and leadership in identifying the need for additional marine protected areas and reserves.

Improve outreach, communication, and collaboration with the public, tribes, and other stakeholder groups.

- Continue consultation and collaboration with tribes. Establish and emphasize pursuit of mutual goals.
- Increase visibility and public awareness of the OCNMS.
- Increase communication and collaboration with the National Park Service, Washington Department of Fish and Wildlife, Department of Defense operations, and other pertinent government and non-governmental entities.
- Where possible, provide data and information to fisheries management entities to improve stock assessments -- but in so doing, characterize the full life cycle of organisms and their habitat associations -- to support sustainable fisheries.

We appreciate the opportunity to participate at this early stage of management plan/regulations revision, and we hope for continued involvement as the update proceeds. If you have questions or would like to discuss these comments in more detail, please contact me at (206)553-2966 or at somers.elaine@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Elaine L. Somers", with a stylized, flowing script.

Elaine L. Somers
NEPA Review Unit